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Attorneys for Plaintiff,
ABKCO MUSIC & RECORDS, INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ABKCO MUSIC & RECORDS, INC.,

Case No.: 10-cv-3064(WHP)(DCF)

Plaintiff,
-against-

CHIMERON, LLC

Defendant.

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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Affidavit of Jody H. Klein and the exhibits attached thereto, all prior pleadings and proceedings herein, Plaintiff, ABKCO Music & Records, Inc., by its attorney Michael B. Kramer, shall move this Court, before the Honorable William H. Pauley III, United States District Judge, in the United States Courthouse, 500 Pearl Street, New York, New York, for an order, pursuant to Fed. Rule Evid. 103(c), barring the introduction of evidence and testimony relating to damages in respect to royalty payments prior to the applicable Statute of Limitations period.

Dated: New York, New York
January 3, 2012

MICHAEL B. KRAMER & ASSOCIATES

By: /s/Michael B. Kramer
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